

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LONTEX CORPORATION,

Plaintiff,

v.

NIKE, INC.,

Defendant.

Civil Action No.: 18-cv-5623

(Hon. Michael M. Baylson)

ORAL ARGUMENT REQUESTED

DEFENDANT NIKE, INC.'S MOTION FOR SANCTIONS

Pursuant to Rules 26, 30, and 45 of the Federal Rules of Civil Procedure and the Court's inherent authority, Defendant NIKE, Inc. ("NIKE") respectfully moves for sanctions against Plaintiff Lontex Corporation and its counsel. NIKE further requests an award of costs and fees incurred in connection with filing this Motion and other relief set out in the proposed Order attached to this Motion. In support of this Motion, NIKE submits the attached Memorandum of Law and the Declaration of Marc E. Miller and the exhibits thereto.

July 17, 2020

Respectfully submitted,

By: /s/ Gina L. Durham

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